LISA LYNNE RUSSELL
Deputy Assistant Attorney General
United States Department of Justice
Environment and Natural Resources Division

PAUL A. TURCKE (Idaho Bar No. 4759) Trial Attorney, Natural Resources Section 1290 West Myrtle Street, Suite 500 Boise, ID 83702 (202) 532-5994 paul.turcke@usdoj.gov

Attorneys for Defendants

## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF ALASKA

VOICE OF THE ARCTIC INUPIAT,

Plaintiff,

v.

Case No. 3:24-cv-00136-SLG

BUREAU OF LAND MANAGEMENT, et al.,

Defendants.

CONOCOPHILLIPS ALASKA, INC.,

Plaintiff,

v.

Case No. 3:24-cv-00142-SLG

DEPARTMENT OF THE INTERIOR, et al.,

Defendants.

NORTH SLOPE EXPLORATION, LLC, et al.,

Plaintiffs,

v.

Case No. 3:24-cy-00143-SLG

UNITED STATES DEPARTMENT OF THE INTERIOR, et al.,

Defendants.

Voice of the Arctic Iñupiat v. BLM, et al DEFS.' MOTION FOR EXTENSION

Case Nos. 3:24-cv-00136, -142, -143, -144, -145-SLG

STATE OF ALASKA,

Plaintiff.

and

ALASKA OIL AND GAS ASSOCIATION,

Intervenor-Plaintiff,

v.

BUREAU OF LAND MANAGEMENT, et al.,

Defendants.

NORTH SLOPE BOROUGH,

Plaintiff,

v.

Case No. 3:24-cv-00145-SLG

Case No. 3:24-cv-00144-SLG

BUREAU OF LAND MANAGEMENT, et al.,

Defendants.

## **DEFENDANTS' UNOPPOSED MOTION FOR EXTENSION OF TIME**

Consistent with Local Civil Rule 7.3(b), Defendants, Bureau of Land Management, et al., hereby respectfully move to extend the current briefing schedule in the above-captioned related cases. No party opposes this motion.

These cases challenge a Final Rule titled "Management and Protection of the National Petroleum Reserve in Alaska." *See* 89 Fed. Reg. 38,712 (May 7, 2024) (the "NPR-A Rule"). Plaintiffs' opening briefs are due on February 14, 2025. *See* Order Re Joint Motion to Address Scheduling, ECF No. 15 (Case No. 3:24-cv-00136-SLG).

Following a change in administration, on January 20, 2025, President Trump issued Executive Order 14153 titled *Unleashing Alaska's Extraordinary Resource*Voice of the Arctic Iñupiat v. BLM, et al Case Nos. 3:24-cv-00136, -142, -143, -144, -145-SLG DEFS.' MOTION FOR EXTENSION 2

Case 3:24-cv-00143-SLG Document 34 Filed 01/31/25 Page 2 of 4

Potential, 90 Fed. Reg. 8,347 (January 29, 2025), a copy of which is attached hereto as Exhibit 1. Section 3 of that Executive Order directs the Secretary of the Interior to "exercise all lawful authority and discretion available to [him] and take all necessary steps to . . . (ix) rescind the [NPR-A Rule]."

In light of these developments, Defendants respectfully seek to extend the current briefing schedule. The Department of the Interior is under new leadership, who require time to become familiar with the issues in this litigation and to determine how they wish to proceed with implementation of the Executive Order. Postponement of briefing and further litigation will conserve judicial resources and promote the efficient and orderly disposition of these cases, including by ensuring that any litigation continuing before this Court will reflect the views of current agency leadership. Furthermore, requiring Defendants to proceed with defending the NPR-A Rule on the current litigation schedule while determining how to address the Executive Order's direction to rescind the same rule would require inconsistent application of administrative resources and disserve the public interest in reasonable efficiency of agency operations.

In light of the foregoing, Defendants respectfully request that the Court issue an order setting the following modified deadlines for further proceedings:

Plaintiffs file opening briefs: March 17, 2025.

Defendants file combined response brief: June 10, 2025.

Intervenor-Defendants file combined response briefs: June 27, 2025.

Plaintiffs file reply briefs: July 28, 2025.

Voice of the Arctic Iñupiat v. BLM, et al DEFS.' MOTION FOR EXTENSION

Case Nos. 3:24-cv-00136, -142, -143, -144, -145-SLG

J

Counsel have conferred, and no party opposes this motion.

Respectfully submitted,

DATED: January 31, 2025. LISA LYNNE RUSSELL

> Deputy Assistant Attorney General United States Department of Justice

Environment and Natural Resources Division

/s/ Paul A. Turcke

PAUL A. TURCKE

Trial Attorney, Natural Resources Section

1290 West Myrtle Street, Suite 500

Boise, ID 83702

202-532-5994 || 202-305-0275 (fax)

paul.turcke@usdoj.gov

Counsel for Defendants

Of Counsel:

JOSHUA HANSON LINDSAY CRONIN Office of the Solicitor United States Department of the Interior

## **CERTIFICATE OF SERVICE**

I hereby certify that on January 31, 2025, a copy of the foregoing was served by electronic means on all counsel of record by the Court's CM/ECF system.

> /s/ Paul A. Turcke Paul A Turcke

Voice of the Arctic Iñupiat v. BLM, et al DEFS.' MOTION FOR EXTENSION

Case Nos. 3:24-cv-00136, -142, -143, -144, -145-SLG